

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

CHARLES LANGONE, as FUND MANAGER
of the NEW ENGLAND TEAMSTERS AND
TRUCKING INDUSTRY PENSION FUND

Plaintiff,

v.

STAMPRETE OF RHODE ISLAND, STAMP
CRETE OF RHODE ISLAND, INC.
AND STAMPED CONCRETE, INC.

Defendants,

C.A. No. 04cv11125 NG

**PLAINTIFF'S MOTION TO COMPEL RESPONSES TO INTERROGATORIES AND
REQUESTS FOR PRODUCTION OF DOCUMENTS PURSUANT TO F.R.C.P. 37(a)(3)**

Pursuant to Federal Rule of Civil Procedure 37(a)(3), the Plaintiff respectfully moves that this Court order the Defendant Stamped Concrete, Inc. to provide further responses to the Questions 4, 6, 7, 8 and 9 of Plaintiff's Interrogatories and Requests for Production of Documents. Attorney for Plaintiff certifies that she has in good faith conferred with Defendant in an attempt to secure disclosure without court action as more clearly stated in the attached motion.

Date: October 12, 2005

Respectfully submitted,

For the Plaintiff,
CHARLES LANGONE, FUND MANAGER
By his Attorney,

/s/ Catherine M. Campbell
Catherine M. Campbell, BBO #549397
Feinberg, Campbell & Zack, P.C.
177 Milk Street
Boston, MA 02109
(617) 338-1976

Certificate of Service

I, Catherine M. Campbell, do hereby certify that on this date, I served the foregoing Motion and Memorandum by first-class mail upon Bruce E. Thompson, Esq., Casey & Thompson, P.C., 8 North Main Street, Attleboro, MA 02703.

/S/ Catherine M. Campbell
Catherine M. Campbell

Date: October 12, 2005